

1 **STP**
2 **MICHAEL D. PARIENTE, ESQ.**
3 Nevada Bar No. 9469
4 **PARIENTE LAW FIRM, P.C.,**
5 **JOHN G. WATKINS, OF COUNSEL**
6 1635 Village Center Circle, Suite 280
7 Las Vegas, Nevada 89169
8 (702) 966-5310, (F) (702) 474-4210
9 Email: michael@parentelaw.com
10 Attorney for Defendant
11 **ROSS LESLIE SWIFT**

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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15
16 UNITED STATES OF AMERICA,) Case No.: 2:25-cr-00030-RFB-DJA
17 Plaintiff,)
18 vs.) **SECOND STIPULATION TO CONTINUE**
19 ROSS LESLIE SWIFT,) **SENTENCING**
20 Defendant)
21)
22)
23)

24 IT IS HEREBY STIPULATED AND AGREED, by and between SEAN P. SULLIVAN,
25 ESQ., and MICHAEL D. PARIENTE, ESQ. and Plaintiff UNITED STATES OF AMERICA, by
26 and through AUSA Kimberly Frayn, counsel for the Government, and submits this stipulation to
27 continue Defendant's sentencing date.

28 The parties request that the sentencing date of September 9, 2025 be vacated and continued
29 to a date and time convenient to this Court, but not sooner than 90 days from September 9, 2025.

30 This stipulation is entered into for the following reasons:

31 1. The Defendant needs additional time to continue working with various governmental
32 officials to obtain identification in his real name.
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34 2. The Defendant and the Government agree to the continuance.

1 3. Defendant is not in custody.
2 4. Denial of this request for a continuance could result in a miscarriage of justice.
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5 DATED this 9th day of September, 2025.
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8 **KIMBERLY FRAYN**

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10 */s/Kimberly Frayn*
11 KIMBERLY FRAYN
12 Assistant United States Attorney
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10 **SEAN P. SULLIVAN, CHTD.**
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10 */s/ Sean P. Sullivan*
11 SEAN P. SULLIVAN, ESQ.
12 Nevada Bar No.: 4768
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10 **PARIENTE LAW FIRM, P.C.**
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10 */s/ Michael D. Pariente*
11 MICHAEL PARIENTE, ESQ.
12 Nevada Bar No.: 9469
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ORD

THE PARIENTE LAW FIRM, P.C.
MICHAEL D. PARIENTE, ESQ.
Nevada Bar No.009469
JOHN G. WATKINS, OF COUNSEL
1635 Village Center Cir., Suite 280
Las Vegas, Nevada 89134
(702) 966-5310

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FINDINGS OF FACT

Based on the pending stipulation of counsel, and good cause appearing therefore, the Court finds:

1. The Defendant needs additional time to continue working with various governmental officials to obtain identification in his real name.
2. The Defendant and the Government agree to the continuance.
3. Defendant is not in custody.
4. Denial of this request for a continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

For all of the above-stated reasons, the ends of justice would be served by vacating the sentencing date scheduled for September 9, 2025.

ORDER

IT IS ORDERED that the sentencing hearing date presently set be vacated, continued and reset December 9, 2025 at 10:00 a.m.

DATED this 9th day of September, 2025.

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THE HONORABLE RICHARD F. BOULWARE, II
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

On September 9, 2025 the undersigned caused a true and correct copy of the aforementioned **DEFENDANT'S SENTENCING MEMORANDUM** via the ECF system.

PARIENTE LAW FIRM, P.C.

/s/ Michael D. Pariente
MICHAEL PARIENTE, ESQ.
Nevada Bar No.: 9469